

U.S. ENVIRONMENTAL PROTECTION AGENCY
POLLUTION/SITUATION REPORT
Tonawanda Coke Corporation - Removal Polrep



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region II

Subject: POLREP #9
RV1
Tonawanda Coke Corporation
0201601
Tonawanda, NY

To: Peter Lopez, EPA, Region 2
Christopher Lyon, EPA ORA Region 2
Walter Mugdan, EPA ORA, Region 2
Angela Carpenter, EPA ERRD, Region 2
John Prince, EPA ERRD, Region 2
Eric Wilson, EPA ERRD, Region 2
Joe Rotola, EPA RAB, Region 2
Eric Mosher, EPA RPB, Region 2
Dore LaPosta, EPA DECA, Region 2
Leonard Voo, EPA DECA, Region 2
Shawna Hoppe, EPA RPB, Region 2
Mark Pane, EPA RAB, Region 2
Thomas Budroe, EPA RAB, Region 2
Dwayne Harrington, EPA RPB, Region 2
Peter Lisichenko, EPA, RAB Region 2
Harish Patel, EPA DECA, Region 2
Douglas McKenna, EPA DECA, Region 2
James Doyle, EPA ORC, Region 2
Margo Ludmer, EPA ORC Region 2
Mary Mears, EPA PAD, Region 2
Michael Basile, EPA PAD, Region 2
James Quinn, NYSDEC
Christopher LaLone, NYSDEC
Kevin Hale, NYSDEC
Bonnie Hriczko, EPA RAB, Region 2
Tim Benton, Weston Solutions

From: Thomas Budroe, OSC

Date: 10/26/2018

Reporting Period: 10/26/2018

1. Introduction

1.1 Background

Site Number:	A28U	Contract Number:	
D.O. Number:		Action Memo Date:	
Response Authority:	CERCLA	Response Type:	Emergency
Response Lead:	EPA	Incident Category:	Removal Action
NPL Status:	Non NPL	Operable Unit:	
Mobilization Date:	10/17/2018	Start Date:	10/17/2018
Demob Date:		Completion Date:	
CERCLIS ID:	NYD088413877	RCRIS ID:	
ERNS No.:		State Notification:	Yes
FPN#:		Reimbursable Account #:	

1 Incident Category

Abandoned coke manufacturing plant releasing hazardous substances into the environment.

1.1.2 Site Description

Tonawanda Coke Corporation is a coke manufacturing plant; approximately 160 acres in an industrial area. The facility has been in operation for approximately 100 years. The 30 currently operating coke ovens have been in use since early 1960.

1.1.2.1 Location

The facility is located at 3875 River Rd, Tonawanda, Erie County, New York. The area is an industrial area adjacent to the Niagara River. The nearest residence is located approximately 0.25 miles away.

1.1.2.2 Description of Threat

Flammable liquids contained in bulk storage tanks pose a threat of fire and explosion should they encounter an ignition source. Sodium hydroxide, a corrosive material, has been discharged onto the ground and poses a health threat to anyone who may come in contact with this material. One scrubber tower contains a pyrophoric material which may spontaneously combust if the nitrogen blanket inside the vessel is not maintained. Drums of hydrochloric acid and solvents are being stored on an unpaved surface without secondary containment. A full removal site evaluation will be conducted and addressed following facility

shutdown.

1.1.3 Preliminary Removal Assessment/Removal Site Inspection Results

EPA is inspecting the Site, with limited assistance from TCC, to identify all areas of concern and determine which facility operations will require EPA's immediate attention to circumvent a release of hazardous substances to the environment.

Sixteen samples of pipe insulation were collected for asbestos analysis. Results are due in three days.

2. Current Activities

2.1 Operations Section

2.1.2 Response Actions to Date

See previous POLREPS for additional response actions.

EPA was informed that the Tonawanda Coke Corp. (TCC) would be leaving the plant during a Saturday - Sunday, October 27 - 28, 2018, transition period. The TCC boiler operators shall operate the boiler until 8:00 AM on Sunday, October 28, 2018. One TCC By Products Operator and one TCC security guard shall also work until 8:00 AM on Sunday, October 28, 2018. The remainder of the TCC staff shall be laid off sometime on Saturday, October 27, 2018. EPA is preparing to continue running the boiler and operations necessary to treat the contaminated aqueous waste streams stored on-site. One former TCC employee shall be on-site to begin working for EPA's ERRS contractor as a By Products Operator/Supervisor on Saturday, October 27, 2018. Seven additional former TCC employees shall begin working for EPA's ERRS contractor as By Products Operators, Boiler Operators and one as an electrician beginning on Saturday, October 27, 2018. The accounts for each utility servicing the plant are being transferred to EPA's ERRS contractor.

A pump supporting the Ammonia Still system once again became clogged with tar and the system shut down. The pump was cleaned, repaired, placed back into service and cycled up to the maximum achievable treatment rate of 50 gallons per minute. An emergency repair was conducted on the compressor airline servicing the boiler controls. The line leak was clamped. A permanent repair shall be completed in the future.

The subcontractor servicing the propane tank which fuels the heater in the pump/electrical room in the Site 108 area informed EPA that the propane tank has a device attached. This device allows the subcontractor to monitor the level of the tank and service it when necessary. EPA's contractor shall have this service contract placed in their name as soon as possible.

EPA's RST3 contractor collected sixteen samples of pipe insulation for asbestos analysis. Results are due in three days.

The plant manager provided EPA with an index of the engineering files contained in filing cabinets.

2.1.3 2.1.3 Enforcement Activities, Identity of Potentially Responsible Parties (PRPs)

TCC filed for bankruptcy on October 16, 2018. ORC continues to represent EPA's interest with TCC attorneys.

2.1.4 Progress Metrics

<i>Waste Stream</i>	<i>Medium</i>	<i>Quantity</i>	<i>Manifest #</i>	<i>Treatment</i>	<i>Disposal</i>

2.2 Planning Section

2.2.1 Anticipated Activities

EPA is preparing to assume responsibility for securing the Site. Upon being notified that TCC is no longer maintaining the treatment of storm water and process water discharges, EPA reached out internally to obtain information regarding the two treatment system design and operation. EPA is considering operating these systems with input of experts from EPA's Division of Enforcement and Compliance Assistance (DECA). In order to evaluate the current effectiveness of these systems, EPA will be sampling the discharge from both during the week of October 22, 2018. DESA will conduct sample collection and samples will be analyzed by the EPA Region 2 lab. There has been conflicting information from TCC regarding the layoff of plant personnel responsible for the operation of the boiler which is necessary to maintain steam lines which will provide for additional purging of the system and operation of the byproduct treatment system. It is however EPA's understanding that TCC will continue to operate the boiler in the near term. EPA will continue efforts to assume responsibility for all utilities in order to maintain power to the facility. EPA will also continue to work with the TCC Environmental Manager to gain information regarding plant operations and potential/actual releases of hazardous substances. EPA is preparing to sample and cleanup contamination in two separate plant areas.

2.2.1.2 Next Steps

EPA will continue to assess the potential public and environmental threats posed by the Site.

2.2.2 Issues

TCC will not inform EPA how long they will remain on site to assist with transition.

2.3 Logistics Section

No information available at this time.

2.4 Finance Section

Estimated Costs *

	Budgeted	Total To Date	Remaining	% Remaining
Extramural Costs				
ERRS - Cleanup Contractor	\$550,000.00	\$0.00	\$550,000.00	100.00%
Intramural Costs				
Total Site Costs	\$550,000.00	\$0.00	\$550,000.00	100.00%

* The above accounting of expenditures is an estimate based on figures known to the OSC at the time this report was written. The OSC does not necessarily receive specific figures on final payments made to any contractor(s). Other financial data which the OSC must rely upon may not be entirely up-to-date. The cost accounting provided in this report does not necessarily represent an exact monetary figure which the government may include in any claim for cost recovery.

2.5 Other Command Staff

No information available at this time.

3. Participating Entities

3.2 Cooperating Agencies

EPA is coordinating with, DOJ, NYSDEC and the Town of Tonawanda Water Resources Department.

4. Personnel On Site

Two OSCs, 2 ERRS personnel and two RST3 personnel.

5. Definition of Terms

No information available at this time.

6. Additional sources of information

7. Situational Reference Materials

No information available at this time.